

**Klarquist**

One World Trade Center  
121 SW Salmon Street, Suite 1600  
Portland, Oregon 97204 USA

**J. Christopher Carraway**  
Partner  
503-595-5300  
christopher.carraway@klarquist.com

May 28, 2025

**Via ECF**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMORANDUM ENDORSED**

Re: *Stephanie M. Reveron v. Zumiez, Inc., et al.*, Case No. 23-cv-10114-JGLC-GWG

Dear Judge Gorenstein:

We write on behalf of Defendant Amazon.com, joined by and with permission of the other two Defendants, Etsy, Inc. and Redbubble, Inc. for an adjournment of the case management conference from June 4, 2025 at 10:30 am to July 16, 2025 at 10:30 am. The undersigned talked with Your Honor's Deputy Clerk on May 28, 2025 to tentatively hold that proposed new date and time. Plaintiff Stephanie Reveron has consented to this adjournment, including the proposed date and time.

On May 6, 2024 (Dkt. 169), Your Honor endorsed a proposed continuance of the scheduling conference to June 4, 2025 at 10:30 am because, at the time, Plaintiff was proposing to file a Third Amended Complaint ("TAC") that would change some of the issues in the case and add three defendants.

On May 16, 2025 (Dkt. 172), Your Honor granted Plaintiff leave to file her TAC on or before May 21, 2025. Plaintiff has informed the undersigned that she filed her Third Amended Complaint with the Pro Se Office on May 27, 2025. The TAC adds multiple new counts, changes the alleged trademarks asserted against the existing Defendants, and adds Defendants GRG USA, LLC, Exit 9, Inc., and Pause Café Inc., which were previously dismissed with prejudice. It is unknown whether those three additional Defendants have been served or are yet represented by counsel.

Given Plaintiff's representation that she filed the TAC, any Defendants that have been served would have fourteen days after service to file responses, including answers, counterclaims, and/or any motions to dismiss for failure to state a claim. Then, Plaintiff would have twenty-one days to respond to any counterclaims. Depending on what each Defendant determines and then files, Defendants expect that the scope of the case, including the scope of discovery, amount of time reasonably needed for discovery, and other issues addressed by the joint proposed scheduling order could be quite different. Further, the Third Amended Complaint purported to add three additional Defendants that had previously been dismissed with prejudice from the case. Those Defendants would likely need additional time to prepare for any scheduling conference.

**Klarquist**

Honorable Gabriel W. Gorenstein  
May 28, 2025  
Page 2

For all the above reasons, the existing Defendants respectfully request that the case management conference currently scheduled for June 4, 2025, be continued until July 16, 2025 at 10:30 am. Plaintiff and counsel for each existing Defendant have consented to that date and time provided by the Deputy Clerk.

Respectfully submitted,

*/s/ J. Christopher Carraway*

J. Christopher Carraway

cc: Stephanie M. Reveron, *Pro Se* Plaintiff (via email)  
All Counsel of Record (via ECF)

Granted. Conference adjourned to July 16, 2025, at 10:30 a.m. The dial in number is changed to: 646-453-4442 and the access code is changed to: 257 721 22#. The provisions of Docket # 157 otherwise continue to apply.

So Ordered.

  
\_\_\_\_\_  
GABRIEL W. GORENSTEIN  
United States Magistrate Judge

May 29, 2025